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16 Attorney for Plaintiff:  
17 Cynthia Todd

18 **IN THE UNITED STATES DISTRICT COURT**  
19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

20 CYNTHIA TODD,

21 Plaintiff,

22 vs.

23 AT&T CORP., EQUIFAX INFORMATION  
24 SERVICES LLC., NATIONAL CONSUMER  
25 TELECOM and UTILITIES EXCHANGE, INC.,  
26 EXPERIAN INFORMATION SOLUTIONS INC.,  
27 and DOES 1-10.

28 Defendants.

**Case No. 16-cv-03357-HSG**

**STIPULATION AND ORDER  
EXTENDING TIME FOR  
DISCOVERY AND EXTENDING  
DEADLINE TO DESIGNATE  
REBUTTAL EXPERTS**

29 The parties hereby request and stipulate to move the non-expert and expert discovery  
30 deadline to April 28, 2017 and the deadline to designate rebuttal experts with reports to April

14, 2017. Currently, the discovery deadline closes on April 14, 2017 and the deadline to designate rebuttal experts is March 31, 2017. All other dates to remain the same.

The parties have engaged in extensive written discovery including follow-up discovery. Plaintiff's deposition was conducted on March 6, 2017. The remaining defendant depositions have been noticed and will be conducted in April 2017. On March 17, 2017, Plaintiff disclosed her expert with report. The parties have scheduled mediation to occur on April 20, 2017, with the Honorable Judge Ware, Ret. The parties have not yet scheduled the deposition of Plaintiff's expert. Furthermore, Plaintiff expects to depose Defendant's rebuttal expert.

The parties believe additional time is needed to conduct meaningful discovery, have a productive mediation session, depose Plaintiff's and Defendants' rebuttal experts and that moving the discovery deadline to April 28<sup>th</sup> and the deadline to designate rebuttal experts to April 14<sup>th</sup> will facilitate this goal.

Previously, the parties agreed to move the deadline to disclose experts to March 17, 2017 and to move the close of non-expert discovery to April 14, 2017. See Docket #68, #70. All other dates to remain the same.

As such, the parties agree and stipulate to the following:

April 14, 2017	Last Day to Designate Rebuttal Experts with Reports
April 28, 2017	Fact and Expert Discovery Closes

**SO STIPULATED:**

Dated: March 22, 2017

AT&T SERVICES, INC. - LEGAL  
DEPARTMENT

By: /s/ Robert B. Mullen  
Robert B. Mullen

Attorneys for Defendant  
AT&T CORP.

Dated: March 22, 2017

KING & SPALDING LLP

By: /s/ J. Anthony Love

J. Anthony Love

Attorney for Defendant Equifax Information  
Solutions, Inc., and NCTUE

Dated: March 22, 2017

LAW OFFICE OF BALAM O. LETONA, INC.

By: /s/ Balam O. Letona

Balam O. Letona

Attorney for Plaintiff  
CYNTHIA TODD

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: March 27, 2017



**Hon. Haywood S. Gilliam, Jr.**  
**United States District Judge**